



Association of Public Safety Communications Officials, Inc.
Washington State Chapter

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Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW Washington, DC 20554

RE: WT Docket 05-196

Greetings:

On behalf of the Washington Chapter of APCO and its more than 400 members, we strongly support the FCC's ruling to require interconnected VoIP providers to ensure they are able to deliver accurate location and call back information to the PSAP when their customers call 9-1-1.

It is imperative that we have every resource available to us to find callers when they are unable to provide accurate locations during their time of crisis. It is a proven phenomenon that a caller can lose their focus during a crisis and not be able to recall even the simplest of details such as their own address. We anticipate that the same phenomenon can also keep callers from choosing the phone with adequate 9-1-1 capabilities if they even have a second phone that provides these critical services. There is also the potential for citizens in crisis to be restricted to an area where they cannot access the phone with adequate 9-1-1 capabilities, such as a medical emergency that prohibits their movement. The citizens of our communities have an expectation that any functioning telephone will reach 9-1-1 in an emergency.

We ask that the Commission not extend the 120 day deadline for interconnected VoIP providers to provide enhanced 9-1-1 services to their customers as they were very aware of this problem and failed to act prior to saturating the market with these devices. Please ensure that any requirements imposed on VoIP providers does not cause undue burden on a PSAP's ability to process and dispatch an emergency response to a 9-1-1 call. Finally, please ensure that the Commission's rules take in to consideration the operational requirements of the current PSAP infrastructure and not impose rules that will require considerable upgrades or replacement of PSAP equipment.

Sincerely,

Deb Welsh
President – APCO, Washington Chapter

cc: APCO International Office of Legislative Affairs